

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

TAPESTRY, INC.,

and

CAPRI HOLDINGS LIMITED.

Defendants.

REDACTED VERSION

Case No. 1:24-cv-03109-JLR

**DECLARATION OF VICTORIA SIMS IN SUPPORT OF PLAINTIFF'S MOTION TO
EXCLUDE TESTIMONY OF JEFF GENNETTE**

I, Victoria Sims, an attorney acting on behalf of the United States government, declare that the following is true and correct under penalty of perjury.

1. I am an attorney at the Federal Trade Commission (the "Commission" or "FTC"), Bureau of Competition, and counsel for Plaintiff FTC in the above-captioned matter. I have personal knowledge of the facts set forth in this declaration. I submit this declaration in support of Plaintiff's Motion to Exclude the Testimony of Jeff Gennette.
2. Attached as Exhibit A to this declaration is a true and correct copy of PX2835 (CAPRI-001480773), a document produced and designated Confidential by Capri Holdings Limited. This exhibit is being filed under seal.

3. Attached as Exhibit B to this declaration is a true and correct copy of the Report of Jeff Gennette dated August 7, 2024, served by Defendants in this matter and designated Confidential. This exhibit is being filed under seal.
4. Attached as Exhibit C to this declaration is a true and correct copy of the Exhibits and Appendices to the Report of Jeff Gennette dated August 7, 2024, that was designated Confidential, served by Defendants in this matter. This exhibit is being filed under seal.
5. Attached as Exhibit D to this declaration is a true and correct copy of the transcript of the deposition of Jeff Gennette taken in this action on August 20, 2024, designated Confidential. This exhibit is being filed under seal.
6. Attached as Exhibit E to this declaration is a true and correct copy of the transcript of the deposition of [REDACTED] (PX5037), testifying as the corporate representative of [REDACTED], in this matter, dated July 19, 2024 and designated Confidential. This exhibit is being filed under seal.

Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury that the foregoing is true and correct.

Dated: August 26, 2024

Respectfully submitted,

S/ Victoria Sims

Victoria Sims (DC Bar No. 1006974) (*pro hac*)

Federal Trade Commission

600 Pennsylvania Avenue, N.W.

Washington, DC 20580

Phone: (202) 538-0792

Email: vsims@ftc.gov

Counsel for Plaintiff Federal Trade Commission